

Exhibit D

David Rothstein

From: David Rothstein <drothstein@rothsteinlawfirm.com>
Sent: Monday, January 26, 2015 6:29 PM
To: Kathryn Thomas (KThomas@gsblaw.net) (KThomas@gsblaw.net)
Cc: kathy.helms@ogletreedeakins.com
Subject: Irani v. Palmetto Health et al.

Dear Kathryn. I have had a chance to review your discovery responses, and I am frankly shocked at your failure or refusal to respond to Plaintiff's interrogatories and requests for production in a manner that remotely resembles good faith. I do not understand why you required an extension to object to 13 out of 16 interrogatories in Plaintiff's First Set of Interrogatories. You also have not provided a single document in response to the requests for production. The scheduling order in this case requires an informal telephone conference with Judge Currie before the filing of a motion to compel. Please let me know what your availability is like this week so that I can contact Judge Currie's chambers to schedule this telephone conference. Thank you. Dave.

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[Please Note New Address Effective July 1, 2014:]

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